

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LHB INSURANCE BROKERAGE INC., On  
Behalf Of Itself And All Others Similarly Situated,

Plaintiff,

vs.

CITIGROUP INC. and CITIGROUP GLOBAL  
MARKETS, INC.,

Defendants.

Civil Action No. 08-CV-3095 (LTS)

*[additional captions follow]*

**NOTICE OF MOTION OF WEDGEWOOD TACOMA LLC AND JEMSTONE LLC  
FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS AND APPROVAL  
OF SELECTION OF LEAD COUNSEL**

**MILBERG LLP**

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***Proposed Lead Counsel for the Class***

LISA SWANSON, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

CITIGROUP INC., CITIGROUP GLOBAL  
MARKETS, INC. AND CITI SMITH BARNEY,

Defendants.

Civil Action No. 08-CV-3139 (LTS)

SAMUEL A. STOCKHAMER and ALICE L.  
STOCKHAMER, On Behalf of Themselves and  
All Others Similarly Situated,

Plaintiffs,

vs.

CITIGROUP INC. and CITIGROUP GLOBAL  
CAPITAL MARKETS, INC.

Defendants.

Civil Action No. 08-CV-3904 (LTS)

WEDGEWOOD TACOMA LLC, Individually  
And On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

CITIGROUP INC., CITIGROUP GLOBAL  
MARKETS, INC., and CITI SMITH BARNEY,

Defendants.

Civil Action No. 08-CV-4360 (LTS)

PLEASE TAKE NOTICE that Wedgewood Tacoma LLC and Jemstone LLC (“Movants”), by their counsel will hereby move this Court on a date and at such time as my be designated by the Court, at 500 Pearl Street, New York, New York for an order: (i) consolidating *LHB Insurance Brokerage Inc. v. Citigroup Inc.*, No. 1:08-CV-3095 (LTS); *Swanson v. Citigroup Inc.*, No. 1:08-CV-3139 (LTS); and *Stockhamer v. Citigroup Inc.*, No. 1:08-CV-3904 (LTS) with *Wedgewood Tacoma LLC v. Citigroup Inc.*, No. 1:08-CV-4360 for all purposes pursuant to Fed. R. Civ. P. 42(a); (ii) appointing Wedgewood Tacoma LLC and Jemstone LLC as Lead Plaintiffs in the actions alleging violations of the securities laws, *LHB Insurance Brokerage Inc. v. Citigroup Inc.*, No. 1:08-CV-3095 (S.D.N.Y. filed Mar. 26, 2008) (LTS); *Swanson v. Citigroup, Inc.*, No. 1:08-CV-3139 (S.D.N.Y. filed Mar. 27, 2008) (LTS); and *Wedgewood Tacoma LLC v. Citigroup Inc.*, No. 1:08-CV-4360 (S.D.N.Y. filed May 8, 2008) (LTS) (collectively the “Securities Actions”); (iii) approving Movants’ selection of Milberg LLP (“Milberg”) to serve as Lead Counsel in the Securities Actions; (iv) appointing Milberg as Interim Lead Counsel with respect to the Investment Advisors Act claim pursuant to Fed. R. Civ. P. 23 (g)(3); and (v) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Movants submit herewith a Memorandum of Law, a [Proposed] Order, and the Declaration of Jerome M. Congress, dated May 27, 2008.

Dated: May 27, 2008

Respectfully submitted,

**MILBERG LLP**

By: /s/ Jerome M. Congress  
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**CERTIFICATE OF SERVICE**

I, Jerome M. Congress, a partner with the law firm Milberg LLP, hereby certify that I caused a true and correct copy of the following documents to be served with the Clerk of the Court using the CM/ECF system, which will send notifications of filing to the CM/ECF participants listed on the attached Service List, and caused all counsel listed on the Service List to be served by regular U.S. Mail on this 27<sup>th</sup> day of May 2008:

1. NOTICE OF MOTION OF WEDGEWOOD TACOMA LLC AND JEMSTONE LLC FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS AND APPROVAL OF SELECTION OF LEAD COUNSEL;
2. [PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING LEAD PLAINTIFFS AND APPROVING LEAD PLAINTIFFS' SELECTION OF LEAD COUNSEL;
3. MEMORANDUM OF LAW IN SUPPORT OF THE MOTION OF WEDGEWOOD TACOMA LLC AND JEMSTONE LLC FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS AND APPROVAL OF SELECTION OF LEAD COUNSEL; AND
4. DECLARATION OF JEROME M. CONGRESS IN SUPPORT OF THE MOTION OF WEDGEWOOD TACOMA LLC AND JEMSTONE LLC FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS AND APPROVAL OF SELECTION OF LEAD COUNSEL.

/s/ Jerome M. Congress

Jerome M. Congress

Citigroup Inc. (ARS)

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LHB INSURANCE BROKERAGE INC., On  
Behalf Of Itself And All Others Similarly Situated,

Plaintiff,

vs.

CITIGROUP INC. and CITIGROUP GLOBAL  
MARKETS, INC.,

Defendants.

Civil Action No. 08-CV-3095 (LTS)

*[additional captions follow]*

**[PROPOSED] ORDER CONSOLIDATING ACTIONS,  
APPOINTING LEAD PLAINTIFFS AND APPROVING LEAD  
PLAINTIFFS' SELECTION OF LEAD COUNSEL**

LISA SWANSON, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

CITIGROUP INC., CITIGROUP GLOBAL  
MARKETS, INC. AND CITI SMITH BARNEY,

Defendants.

Civil Action No. 08-CV-3139 (LTS)

SAMUEL A. STOCKHAMER and ALICE L.  
STOCKHAMER, On Behalf of Themselves and  
All Others Similarly Situated,

Plaintiffs,

vs.

CITIGROUP INC. and CITIGROUP GLOBAL  
CAPITAL MARKETS, INC.

Defendants.

Civil Action No. 08-CV-3904 (LTS)

WEDGEWOOD TACOMA LLC, Individually  
And On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

CITIGROUP INC., CITIGROUP GLOBAL  
MARKETS, INC., and CITI SMITH BARNEY,

Defendants.

Civil Action No. 08-CV-4360 (LTS)



Upon consideration of the motions and supporting papers for consolidation, appointment of lead plaintiffs and lead counsel in the above-captioned action and for good cause shown,

IT IS HEREBY ORDERED THAT:

1. The Motion of Wedgewood Tacoma LLC and Jemstone LLC is GRANTED.
2. *LHB Insurance Brokerage Inc. v. Citigroup Inc.*, No. 1:08-CV-3095 (S.D.N.Y. filed Mar. 26, 2008) (LTS); *Swanson v. Citigroup Inc.*, No. 1:08-CV-3139 (S.D.N.Y. filed Mar. 27, 2008) (LTS); *Stockhamer v. Citigroup Inc.*, No. 1:08-CV-3904 (S.D.N.Y. filed Apr. 25, 2008) (LTS) and *Wedgewood Tacoma LLC v. Citigroup Inc.*, No. 1:08-CV-4360 (S.D.N.Y. filed May 8, 2008) (LTS) are hereby CONSOLIDATED for all purposes.
3. Wedgewood Tacoma LLC and Jemstone LLC are hereby APPOINTED to serve as Lead Plaintiffs in the actions alleging violations of the securities laws, *LHB Insurance Brokerage Inc. v. Citigroup Inc.*, No. 1:08-CV-3095 (S.D.N.Y. filed Mar. 26, 2008) (LTS); *Swanson v. Citigroup Inc.*, No. 1:08-CV-3139 (S.D.N.Y. filed Mar. 27, 2008) (LTS); and *Wedgewood Tacoma LLC v. Citigroup Inc.*, No. 1:08-CV-4360 (S.D.N.Y. filed May 8, 2008) (collectively the “Securities Actions”), pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995.
4. Milberg LLP (“Milberg”) is hereby APPOINTED to serve as Lead Counsel for the Class in the Securities Actions, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995, in the above-captioned action.
5. The law firm Milberg is hereby APPOINTED as Interim Lead Counsel with respect to the Investment Advisors Act claim pursuant to Fed. R. Civ. P. 23(g)(3).

SO ORDERED.

Dated: \_\_\_\_\_, 2008

\_\_\_\_\_  
United States District Judge